

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
--	---

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Inc., Ethicon, Inc., and Boston Scientific Corporation (collectively “Defendants”), jointly move the court to dismiss with prejudice this action and all claims against Defendants which were, or could have been asserted, pursuant to F. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Mark R. Mueller

Mark R. Mueller

Mueller Law

404 West 7th Street

Austin, TX 78701502-805-1800

receptionist@muellerlaw.com

512-478-1236

Counsel for Plaintiffs

/s/ William M. Gage

William M. Gage (MS Bar #8691)

Butler Snow LLP

1020 Highland Colony Parkway

Suite 1400 (39157)

P.O. Box 6010

Ridgeland, MS 39158-6010

(601) 985-4561

william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)

Thomas Combs & Spann PLLC

300 Summers Street

Suite 1380 (25301)

P.O. Box 3824

Charleston, WV 24338

(304) 414-1800

srobinson@tcspllc.com

Counsel for Defendants Johnson & Johnson, Inc. and Ethicon, Inc.

/s/ Jon A. Strongman

Jon A. Strongman

Shook Hardy & Bacon

2555 Grand Boulevard

Kansas City, MO 64108

816/474-6550

Fax: 816/421-5547

Email: jstrongman@shb.com

Counsel for Boston Scientific Corporation

EXHIBIT A

Civil Action Number	Last Name	First Name
2:13-cv-04554	Anthis	Malinda
2:12-cv-08721	Appollo	Pamela
2:12-cv-00269	Carr	Iris

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

41367288.v2